

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

<b>In the Matter of</b>	)	
	)	
<b>Federal-State Joint Board on Universal Service</b>	)	
	)	
<b>NPCR, Inc. d/b/a Nextel Partners</b>	)	<b>CC Docket No. 96-45</b>
	)	
<b>Petition for Designation as an Eligible</b>	)	
<b>Telecommunications Carrier in the</b>	)	
<b>State of New York</b>	)	

**COMMENTS OF  
THE NEW YORK STATE TELECOMMUNICATIONS ASSOCIATION, INC.**

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August 18, 2003

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THE NEW YORK STATE TELECOMMUNICATIONS ASSOCIATION, INC.**

On July 16, 2003, the Federal Communications Commission (“FCC” or “Commission”) released for comment the Petition for Eligible Telecommunications Carrier (“ETC”) status by Nextel Partners (“Nextel”) for the State of New York.<sup>1</sup> Nextel had filed its Petition with the FCC on April 3, 2003 requesting approval, stating that it satisfies all of the statutory and regulatory prerequisites for ETC designation, that its designation as an ETC will serve the public interest, and that the New York Public Service Commission (“NYSPSC”) provided an affirmative statement that it does not regulate Commercial Mobile Radio Service (“CMRS”) carriers.<sup>2</sup>

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<sup>1</sup> *Wireless Competition Bureau Seeks Comment on Nextel Partners of Upstate New York, Inc. d/b/a Nextel Partners Petition for Designation as an Eligible Telecommunications Carrier in the State of New York*, CC Docket No. 96-45, Public Notice, DA 03-2329 (released July 16, 2003). The Notice regarding the request for comment appeared in the *Federal Register* on August 6, 2003, 68 Fed. Reg. 46,633 (2003).

<sup>2</sup> NPCR, Inc. d/b/a Nextel Partners Petition for Designation as an Eligible Telecommunications Carrier in the State of New York (filed April 3, 2003). *See also*: NPCR, Inc. d/b/a Nextel Partners Erratum to Petition for Designation as an Eligible Telecommunications Carrier in the State of New York (filed April 9, 2003) which clarifies that Verizon and Frontier Telephone of Rochester are non-rural LECs and breaks out the Verizon wire centers served by Nextel Partners. (“Nextel Petition”).

## **SUMMARY**

The New York State Telecommunications Association, Inc. (“NYSTA”) hereby expresses our opposition to the grant of Nextel’s Petition.<sup>3</sup> Approving Nextel’s deficient Petition would be poor public policy because it will not further the Commission’s goals of promoting universal service nor developing a competitive telecommunications marketplace for the areas cited by Nextel’s Petition and could result in federal universal service fund (“USF”) monies being used to support non-specified services. Accordingly, the Commission should dismiss Nextel’s Petition as failing to meet the requirements for ETC designation and/or deny the Petition as not in the public interest.

In the alternative, consideration of Nextel’s request should be held in abeyance until such time as the Commission resolves pending ETC eligibility and USF funding issues, which are being considered in a separate proceeding.<sup>4</sup>

## **STATEMENT OF INTEREST**

NYSTA is a non-profit association incorporated in 1921 whose membership includes all of the incumbent local exchange carriers operating in New York State as well as several competitive local exchange carriers, interexchange carriers, and Internet service providers. The incumbent local exchange carrier members of NYSTA (“ILECs”) have all been certified as ETCs and were providing ubiquitous service prior to

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<sup>3</sup> The member companies of NYSTA concurring in this filing appears as Attachment I.

<sup>4</sup> *Federal-State Joint Board on Universal Service Seeks Comment on Certain of the Commission’s Rules Relating to High-Cost Universal Service Support and the ETC Designation Process*, CC Docket No. 96-45 (released February 7, 2003).

designation. Nextel has sought ETC designation in all but four of the study areas of these certificated service providers and, accordingly, our member LECs are directly affected by Nextel's Petition.

## **PARAMETERS OF THE ISSUE**

Nextel is a licensed CMRS provider throughout New York State. However, in order to become an ETC, a carrier must demonstrate that designation is in the public interest and that it offers all of the services and functionalities enumerated by Section 54.101(a) of the Commission's Rules.<sup>5</sup> These services include: voice grade access to the PSN, local usage, dual tone multi-frequency switching (or its equivalent), single party service (or its equivalent), access to emergency services, access to operator services, access to interexchange service, access to directory assistance, and toll limitation for qualifying low-income customers. In addition, all ETCs are required to provide LifeLine service.<sup>6</sup> As required by the FCC's Rules, Nextel maintains that it does offer all of these services throughout the designated areas in which it seeks certification.<sup>7</sup>

While ETC applications are normally considered by the state commissions under the Telecommunications Act of 1996<sup>8</sup> and the FCC's Rules,<sup>9</sup> Nextel included a note in its

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<sup>5</sup> 47 CFR 54.201(d) and 47 CFR 54.405.

<sup>6</sup> Nextel Petition, at p. 1.

<sup>7</sup> 47 CFR 54.101(a).

<sup>8</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996), at §214(e)(6) ("Telecom Act").

<sup>9</sup> 47 CFR 54.201.

FCC application from the NYSPSC that under the state Public Service Law it does not have jurisdiction to consider the Petition. It cited to Section 5 of the PSL which indicates that the NYSPSC does not have jurisdiction until such time as it makes a determination after a notice and comment period that reinstituted regulation is in the public interest.<sup>10</sup> As a result, according to Nextel, the FCC has jurisdiction to consider its Petition.

NYSTA is opposed to Nextel's Petition being granted. Its Petition is deficient in numerous respects. Based on our research, Nextel is not providing service in all of the designated areas referenced in its Petition and Nextel provides no details as to when or how it plans to provide service in these areas in the future. In addition, grant of its Petition will not promote competition and Nextel's combination of service offerings does not satisfy a perceived universal service need. Moreover, grant of its request will greatly impair the continued viability of the federal USF. Finally, in the alternative, Nextel's Petition should not be considered pending the outcome of the aforementioned open FCC proceeding regarding ETC designation and USF eligibility.

## **ARGUMENTS:**

### **I. NEXTEL DOES NOT, NOR CAN IT POSSIBLY, MEET THE REQUIREMENTS FOR ETC DESIGNATION AS REQUIRED BY SECTION 214(e) OF THE TELECOM ACT.**

Section 214(e) of the Telecom Act establishes the parameters for designating ETCs.<sup>11</sup> Among these requirements is a mandate that the ETC provide the required

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<sup>10</sup> N.Y. Pub. Serv. Law §5(3).

<sup>11</sup> 47 USC §214(e).

services throughout the requested study area in order to receive universal service support.<sup>12</sup> In the case of rural carriers, the study area is their certificated service territory.<sup>13</sup>

Nextel states in its Petition that the company is licensed to, and provides, wireless telecommunications services throughout the designated areas served by rural telephone companies.<sup>14</sup> However, based on information supplied by Nextel's website, NYSTA is unable to confirm that Nextel provides service in all or part of at least 14 study areas in which it claims that it offers service.

When the zip codes representing these service areas are input into the portion of Nextel's website informing customers of Nextel's network coverage in specified areas,<sup>15</sup> the website indicates that these areas are not covered by Nextel's network. For example, the Nextel webpage indicates that there is no coverage in zip codes served by Citizens Telephone Company of Hammond (13646), Crown Point Telephone Corporation (12928), or Hancock Telephone Company (13783). In addition, the coverage map on Nextel's web site illustrates the large areas of New York State's land mass in which it

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<sup>12</sup> 47 USC §214(e)(1).

<sup>13</sup> 47 USC §214(e)(5).

<sup>14</sup> Nextel Petition, at p. 1.

<sup>15</sup> <http://www.nextel.com/services/coverage/index.shtml>.

does not offer service, much of which includes the service areas designated in its Petition.<sup>16</sup>

However, in this same Petition, Nextel “clarifies” that it “offers, *or will offer upon designation* as an ETC in Designated Areas, all of the services and functionalities required by Section 54.101(a) of the Commission’s Rules.”<sup>17</sup> All of the services and functionalities required for designation as an ETC (such as access to 911) can not possibly be offered upon designation in so many locations where the underlying wireless service itself is not available. Nextel is silent on how it would provide the required services in these low population, high-cost areas that are far from the major highway routes served by Nextel (as identified in the coverage map on their web page), such as the New York State Thruway, which it has thus far avoided.<sup>18</sup> The cost involved to bring service to these remote, rural communities would likely be prohibitive -- even with USF support -- which is probably why Nextel chose not to provide service in the first place. As a result, Nextel’s Petition does not explain how it will satisfy the requirements throughout the designated service territories. Unless it is providing the required services throughout its requested areas upon designation, its Petition is deficient under §214(e) of the Telecom Act and should be dismissed.

As a result of these factual findings, the Commission should not rely on Nextel’s empty claims of providing service in all of its designated areas. Rather, prior to

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<sup>16</sup> <http://www.nextel.com/cgi-bin/localMarketMap.cgi?market=mkt49> displays Nextel’s coverage map for New York State and indicates service availability which almost exclusively follows the state’s major highways.

<sup>17</sup> Nextel Petition, at p. 2. (emphasis added)

<sup>18</sup> *See*: fn. 16, *supra*.



considering its Petition, the Commission should require Nextel to make an affirmative showing that it indeed offers all of the above-enumerated required services as claimed throughout the requested designated areas. In the absence of such a showing, Nextel's Petition is deficient and misleading.

## **II. GRANT OF NEXTEL'S PETITION WOULD BE POOR PUBLIC POLICY.**

### **A. GRANT OF NEXTEL'S PETITION WILL NOT ENHANCE THE AVAILABILITY OF UNIVERSAL SERVICE IN NEW YORK STATE.**

According to the latest FCC data, New York State's local exchange carriers boast a 96.0 percent subscriber rate, which exceeds the national average of 95.3 percent.<sup>19</sup> Clearly, the combination of federal and state programs designed to promote the availability of ubiquitous, affordable telephone service throughout New York State has been largely achieved.

The federal USF is funded by every telephone subscriber in the United States and is intended to ensure all Americans have access to telephone service. An important component of the USF program is LifeLine. Support for the LifeLine program for eligible customers, for example, comes in part from the federal USF and is used to reduce the Subscriber Line Charge ("SLC"). An additional reduction in the cost of basic local service also is provided under the federal USF and from the state.<sup>20</sup>

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<sup>19</sup> *FCC Report "Trends in Telephone Service,"* Industry Analysis and Technology Division, Wireline Competition Bureau, August 2003.

<sup>20</sup> *See: e.g.* 47 CFR 54.403(a).

Wireless providers such as Nextel do not have loop costs to recover but, as an ETC, are permitted to take advantage of the SLC support (currently \$6.50) and are eligible for a reduction in the cost of their basic service provided to their LifeLine customers (\$1.75).<sup>21</sup> This adds up to \$8.25 in support for each residential LifeLine customer. However, considering the higher price for wireless service when compared with landline, it is unlikely that the \$8.25 subsidy off of Nextel's end user price would have an appreciable affect on LifeLine subscription levels and, in turn, universal service goals. In addition, with the 96.0 percent subscriber rate in New York State, NYSTA doubts that grant of Nextel's Petition could actually increase the level of universal service penetration in any event, but would certainly place further constraints on the federal funding process.

Further, it is hard to imagine how grant of Nextel's Petition could promote increased deployment of services to meet the Commission's universal service goals in these rural areas when the company, according to the information supplied on its web site, is not even providing service.

Accordingly, grant of Nextel's Petition would place an enhanced burden on the federal USF as yet another provider would be eligible to draw from the fund with no offsetting benefits which would promote universal service. Permitting such a situation to arise would be poor public policy.

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<sup>21</sup> 47 CFR 54.403(b).

## **B. GRANT OF NEXTEL'S PETITION WILL NOT PROMOTE COMPETITION IN RURAL AREAS OF NEW YORK STATE.**

The company claims that it provides access to interexchange service. However, Nextel's interexchange service may not be the subscriber's carrier of choice. Rather, Nextel's customers are constrained to use Nextel's interexchange carrier service, even though every other ETC in New York permits their customer to choose their own presubscribed interexchange carrier. While Nextel does state in its Petition that access codes can be dialed to enable customers to select other interexchange carriers, in no way does this arrangement comport with the equal access requirements placed on all other ETCs in New York State.<sup>22</sup> As a result, approval of Nextel's Petition would create an unlevel playing field through competitive inequalities among wireline ETCs and wireless ETCs.

An unlevel playing field is also created whereby state commissions must annually certify that the ETCs in their state are using federal high-cost support "only for the provision, maintenance, and upgrading of facilities and services for which the support is intended."<sup>23</sup> This requirement only falls on wireline ETCs in New York State as the NYSPSC claims in the note included in Nextel's Petition that it has no jurisdiction over wireless ETCs.<sup>24</sup> ETCs not subject to state jurisdiction must merely certify on their

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<sup>22</sup> *See: e.g.* 47 CFR 51.209.

<sup>23</sup> 47 CFR 54.314(a).

<sup>24</sup> *See: fn. 10, supra.*

own.<sup>25</sup> As revealed in Nextel's Petition, however, it is very easy to submit empty statements regarding services being offered. The NYSPSC's requirements in issuing these certifications certainly exceed the self-certification "burden" which would be placed on wireless ETCs in the state.

Accordingly, grant of Nextel's Petition would place an enhanced burden on the federal USF and would arrive with no off-setting benefits to promote universal service or competition. Permitting such a situation to arise would be poor public policy.

**C. GRANT OF NEXTEL'S PETITION WOULD RESULT IN FEDERAL UNIVERSAL SERVICE FUNDS BEING USED TO SUPPORT NON-BASIC SERVICES.**

In addition to not serving all of the requested designated areas as required, Nextel's service offerings do not comport with the Commission's service requirements.

While Nextel claims that it will make toll limitation and even LifeLine and Link-Up services available to its customers upon designation, such statements can not be supported by the realities of the marketplace. According to their web page, their least expensive rate plan is \$35.99 per month, with most plans in the \$60 to \$90 range.<sup>26</sup> Even their "low-cost" plan includes three-way calling, call hold, and call waiting in the rate.<sup>27</sup> While Nextel is silent on what service plans it will offer as an ETC, provided it waives

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<sup>25</sup> 47 CFR 54.314(b).

<sup>26</sup> <http://nextelonline.nextel.com/NASApp/onlinestore/Action/EnterZipCode>.

<sup>27</sup> See Nextel's Local Get Right Through 50 Plan.

the activation fee (Link-Up) and offers a reduced, USF-supported price for the service (LifeLine) to low-income applicants, these same customers that can not afford Nextel service without this assistance would be provided with subsidized advanced service options that they would not be eligible to receive from any other ETC as a LifeLine customer under the subsidy. In fact, under the FCC's Rules, only those services listed in §54.101 are eligible for LifeLine support.<sup>28</sup> Accordingly, it is poor public policy and a violation of the FCC's Rules to permit customers, including those that are receiving Link-Up and/or LifeLine, to be given these custom calling services free of charge where the carrier is being subsidized to offer them.

Accordingly, grant of Nextel's Petition would place an enhanced burden on the federal USF by providing USF support for services which are not authorized to be subsidized. Permitting such a situation to arise would be poor public policy.

**D. GRANT OF NEXTEL'S REQUEST WILL GREATLY IMPAIR THE CONTINUED VIABILITY OF THE FEDERAL UNIVERSAL SERVICE FUND.**

Should the Commission grant Nextel's request and permit it to draw from the federal Universal Service Fund, it will create an unlevel playing field between Nextel and all other CMRS providers that have not received ETC status. Nextel's success in tapping into the federal USF will unavoidably inspire every other CMRS provider in New York State to do the same. As a result, all CMRS providers -- including those like Nextel that may not provide ubiquitous service throughout all of the claimed designated areas nor offer all of the required services -- will be able to reap the benefits of this limited national

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<sup>28</sup> 47 CFR 54.401.

resource. The real losers in this case will be all telecommunications customers who will be forced to fund this expansion and receive no benefit in return.

As adequately demonstrated by the Organization for the Protection and Advancement of Small Telecommunications Companies (“OPASTCO”) in its recent White Paper,<sup>29</sup> and in its numerous filings in related proceedings before the FCC, the Universal Service Fund is a time bomb waiting to explode.<sup>30</sup>

According to OPASTCO, if all CMRS providers nationwide were to apply for and receive ETC status, the annual funding level of the High-Cost portion alone of the Universal Service program would increase by approximately \$2 billion, which would seriously threaten the continued viability of the fund.<sup>31</sup> Without the Universal Service Fund, especially the High-Cost program, service in rural and remote areas of the United States may cease to exist. Such a situation can not and should not be considered in the public interest -- which is a necessary finding for ETC designation to be approved under the Telecom Act.<sup>32</sup>

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<sup>29</sup> Stuart Polikoff, *Universal Service in Rural America: A Congressional Mandate at Risk*, OPASTCO (January 2003).

<sup>30</sup> *See: e.g., In the Matter of Federal-State Joint Board on Universal Service, NPCR, Inc. d/b/a Nextel Partners, Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania*, Reply Comments of the Organization for the Promotion and Advancement of Small Telecommunications Companies, CC Docket No. 96-45, filed July 14, 2003. (“OPASTCO Comments”)

<sup>31</sup> OPASTCO Comments, at p. 3.

<sup>32</sup> 47 USC §214(e)(6).

Accordingly, the enhanced burden on the federal USF would arrive with requests from all other wireless providers, which would only make the exploding growth of the USF worse. Permitting such a situation to arise would be poor public policy.

**II. AS AN ALTERNATIVE TO DENYING NEXTEL'S PETITION, CONSIDERATION OF NEXTEL'S REQUEST SHOULD BE HELD IN ABEYANCE UNTIL SUCH TIME AS THE COMMISSION RESOLVES PENDING ETC ELIGIBILITY AND USF FUNDING ISSUES, WHICH ARE BEING CONSIDERED IN A SEPARATE PROCEEDING.**

Should the Commission decide to consider Nextel's Petition on the merits and not accept NYSTA's arguments, it should hold its determination until after resolution of the issues underlying the request. In a separate proceeding at the Commission, issues surrounding USF eligibility and ETC designation are currently being debated.<sup>33</sup> These two issues are especially pertinent to Nextel's request.

First, the question of which carriers are eligible to receive universal service support has been raised in instances where more than one ETC provides service to the same customer. This is often the case where the competitive ETC is a wireless provider and does not supplant the incumbent provider, but they both continue to serve the customer. The issue surrounds whether the first ETC to provide service should be the only one receiving support, whether the wireless carrier should receive support if it replaces the landline provider, or whether both should be eligible.<sup>34</sup> A related question raised by the Commission is at what rate the second ETC should be compensated -- on its

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<sup>33</sup> *See*: fn. 4 *supra*.

<sup>34</sup> *Id.*, at p. 13.

own costs or the incumbent's costs. Comments have been filed on these important questions and the Commission has not yet issued a decision.<sup>35</sup>

The second issue involves the ETC designation process. Specifically, the Commission has asked what criteria should be used to determine whether grant of an ETC request would serve the public interest. Further, it requested comment on whether additional criteria should apply when the petitioner seeks designation in a rural carrier's territory.<sup>36</sup>

Resolution of these issues will greatly impact the Commission's consideration of Nextel's Petition. Instead of addressing applications such as this in a piecemeal fashion, a global resolution where all interested parties can comment should be the preferred method. The establishment of objective criteria to consider USF support eligibility and ETC designation will benefit consumers, the Commission, and the industry as a clear set of rules will be established to apply to all applicants. The Commission should not accept Nextel's Petition prior to completion of that proceeding.

Accordingly, unless it is dismissed for the reasons discussed above, consideration of Nextel's request should be held in abeyance until resolution of the underlying issues in the USF and ETC proceeding.

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<sup>35</sup> *Id.*, at p. 8.

<sup>36</sup> *Id.*, at p. 15.



## **CONCLUSION**

NYSTA respectfully requests that the Commission deny Nextel's request for ETC designation in New York State for the reasons cited above because Nextel fails to meet the requirements of §214(e) of the Telecom Act and §54.101(a) of the FCC's Rules; thus, its Petition is deficient and not in the public interest. In the alternative, the Commission should hold its consideration in abeyance until completion of its generic USF and ETC proceeding.

Respectfully submitted,

**NEW YORK STATE TELECOMMUNICATIONS  
ASSOCIATION, INC.**

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Dated: August 18, 2003

## **Attachment I -- Member Companies Concurring in this Filing**

Armstrong Telephone Company  
Berkshire Telephone Corporation  
Cassadaga Telephone Corporation  
Champlain Telephone Company  
Chautauqua & Erie Telephone Corporation  
Chazy & Westport Telephone Corporation  
Citizens Communications  
Citizens Telephone Company of Hammond, NY  
Crown Point Telephone Corporation  
Delhi Telephone Company  
Dunkirk & Fredonia Telephone Company  
Empire Telephone Corporation  
Fishers Island Telephone Company  
Frontier Communications of AuSable Valley  
Frontier Communications of New York  
Frontier Communications of Seneca-Gorham  
Frontier Communications of Sylvan Lake  
Frontier Telephone of Rochester  
Germantown Telephone Company, Inc.  
Hancock Telephone Company  
Margaretville Telephone Company, Inc.  
Middleburgh Telephone Company  
Newport Telephone Company, Inc.  
Nicholville Telephone Company  
Ogden Telephone Co. (Citizens)  
Oneida County Rural Telephone Company  
Ontario Telephone Company, Inc.  
Pattersonville Telephone Company  
State Telephone Company  
Taconic Telephone Corporation  
TDS Telecom -- Deposit Telephone  
TDS Telecom -- Edwards Telephone  
TDS Telecom -- Oriskany Falls Telephone  
TDS Telecom -- Port Byron Telephone  
TDS Telecom -- Township Telephone  
TDS Telecom -- Vernon Telephone  
Trumansburg Telephone Company  
Verizon-New York  
Warwick Valley Telephone Company